

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

KLLM TRANSPORT SERVICES, LLC

PLAINTIFF

VS.

CIVIL ACTION NO. 3:12-CV-116-HTW-LRA

JBS CARRIERS, INC.

DEFENDANT

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

In accordance with Local Uniform Civil Rule 79, Plaintiff KLLM Transport Services, LLC ("KLLM") respectfully requests that the Court grant it leave to file under seal KLLM's Response in Opposition to JBS Carriers, Inc.'s Motion to Remit Amount of Punitive Damages as Required by Mississippi Law and the Due Process Clause of the United States Constitution, including all exhibits thereto.

This Court entered a Protective Order on October 23, 2012, which provided for confidential and highly confidential designations for sensitive documents and subject matter. (Doc. 27). JBS Carriers submitted at trial a copy of its July 2015 Balance Sheet and marked it as a highly confidential document in accordance with the Protective Order. KLLM will be attaching a copy of JBS Carriers' Balance Sheet to KLLM's Response in Opposition to JBS Carriers' Motion for Remittitur and discussing the contents of the Balance Sheet in detail in its brief.

In accordance with this Court's Protective Order, KLLM seeks leave to file its Response in Opposition to JBS Carriers, Inc.'s Motion to Remit Amount of Punitive Damages as Required by Mississippi Law and the Due Process Clause of the United States Constitution and all related exhibits under seal to protect the confidentiality of JBS Carriers' Balance Sheet and its private financial information.

KLLM conferred with opposing counsel before filing this Motion, and opposing counsel has no opposition.

Given the straightforward nature of this Motion, KLLM respectfully requests relief from the rule requiring a separate memorandum.

THIS the 15th day of October, 2015.

Respectfully submitted,

KLLM TRANSPORT SERVICES, LLC

By Its Attorneys,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

s/ Michael V. Bernier

Michael V. Bernier (MSB No. 103960)

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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing paper with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

B. Lyle Robinson - robinsol@phelps.com

Brian G. Eberle - beberle@sah.com

THIS the 15th day of October, 2015.

s/ Michael V. Bernier

Michael V. Bernier